Statement of Basis of the Federal Operating Permit

Oxy Vinyls, LP

Site Name: Deer Park VCM Plant Physical Location: 5900 Highway 225, Gate 8A Nearest City: Deer Park County: Harris

> Permit Number: O1369 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869 SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected:

A compliance status; and

A list of available unit attribute forms.

Prepared on: July 27, 2016

Operating Permit Basis of Determination

Permit Area Process Description

The Deer Park VCM site produces vinyl chloride monomer (VCM) from ethylene and chlorine, producing first ethylene dichloride (EDC) from the direct chlorination of ethylene, then VCM and hydrogen chloride (HCl) from the pyrolysis of purified EDC. The VCM from the cracking furnaces is purified and stored for shipment to customers, and the HCl is fed back to the oxychlorination (Oxy) unit where it is combined with ethylene and oxygen to produce additional EDC. All continuous process vents from the VCM plant are incinerated in two parallel organic chloride incinerators, a liquid heavy ends stream is recycled offsite, and excess heavy ends are incinerated.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX, HAPS, CO

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - o New Source Review Authorization Requirements
 - Compliance Requirements
 - o Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary

- Additional Monitoring Requirements
- o Permit Shield
- o New Source Review Authorization References
- Compliance Plan
- Alternative Requirements
- Appendix A
 - o Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain

applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	No
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.

- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
F-DPV-05	30 TAC Chapter 111, Visible Emissions	R1111-SW-BLAST	UNIT TYPE = EMISSION UNIT FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+')	Unit is subject to 30 TAC § 111.111(a)(8)(A). Customized periodic monitoring was created using the text from Special Term and Condition 3.C.iii.1-4 with the addition of this sentence "The determination of visible emissions shall be made at the nearest property line downwind of the source or within 500 feet of the source, whichever is closer to the source."
F-DPV-06	30 TAC Chapter 111, Visible Emissions	R1111-SW-PAINT	UNIT TYPE = EMISSION UNIT FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+')	Unit is subject to 30 TAC § 111.111(a)(8)(A). Customized periodic monitoring was created using the text from Special Term and Condition 3.C.iii.1-4 with the addition of this sentence "The determination of visible emissions shall be made at the nearest property line downwind of the source or within 500 feet of the source, whichever is closer to the source."
T6001	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Direct-flame incinerator	
T6001	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Direct-flame incinerator	
T6001	40 CFR Part 60, Subpart K	60K-T6001	Construction/Modification Date = On or before June 11, 1973	
T6001	40 CFR Part 63, Subpart G	63G-T6001	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G). Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
T6002	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T6002	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T6002	40 CFR Part 60, Subpart K	60K-T6002	Construction/Modification Date = On or before June 11, 1973	
T6002	40 CFR Part 63, Subpart G	63G-T6002	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
T6003A	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T6003A	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T6003A	40 CFR Part 60, Subpart K	60K-T6003A	Construction/Modification Date = On or before June 11, 1973	
T6003A	40 CFR Part 63, Subpart G	63G-T6003A	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
Т6003В	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
Т6003В	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T6003B	40 CFR Part 60, Subpart K	60K-T6003B	Construction/Modification Date = On or before June 11, 1973	
Т6003В	40 CFR Part 63, Subpart G	63G-T6003B	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
Т6226	30 TAC Chapter 115, Storage of VOCs	R5112-T6226	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank does not require emission controls	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
T6226	40 CFR Part 63,	63G-T6226	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.	
	Subpart G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.	
Т9511	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9511	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
Т9511	40 CFR Part 60, Subpart K	60K-T9511	Construction/Modification Date = On or before June 11, 1973	
T9511	40 CFR Part 63, Subpart G	63G-T9511	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
T9555	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9555	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9555	40 CFR Part 60, Subpart K	60K-T9555	Construction/Modification Date = On or before June 11, 1973	
T9555	40 CFR Part 63, Subpart G	63G-T9555	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
Т9567	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9567	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9567	40 CFR Part 60, Subpart K	60K-T9567	Construction/Modification Date = On or before June 11, 1973	
Т9567	40 CFR Part 63, Subpart G	63G-T9567	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
Т9568	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9568	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
T9568	40 CFR Part 63,	63G-T9568	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	Subpart G		Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
V475	30 TAC Chapter 115, Storage of VOCs	R5112-V475	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank does not require emission controls	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
V475	40 CFR Part 60, Subpart K	60K-V475	Construction/Modification Date = On or before June 11, 1973	
V475	40 CFR Part 63,	63G-V475	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.	
	Subpart G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.	
V477	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
V477	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Direct-flame incinerator	
V477	40 CFR Part 60, Subpart K	60K-V477	Construction/Modification Date = On or before June 11, 1973	
V477	40 CFR Part 63, Subpart G	63G-V477	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H	
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.	
			Bypass Lines = Closed vent system has no by-pass lines.	
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)	
			Control Device Type = Hazardous waste incinerator as specified in 40 CFR § 63.120(d)(8)(iii)	
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)	
			Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.	
V6108	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
			Control Device Type = Direct-flame incinerator	
V6108	30 TAC Chapter 115, Storage of VOCs	R5112-MVP-HCIN3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Control Device Type = Direct-flame incinerator	
V6108	40 CFR Part 63, Subpart G	63G-V6108	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61,	
			Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.	
DPV-008-1	30 TAC Chapter 115, Loading	R5211-DPV-8-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	and Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Only loading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading less than 20,000 gallons per day.	
DPV-008-1	40 CFR Part 63, Subpart G		Alternate Parameter Monitoring = Approval has not been sought or has not been granted by the EPA Administrator to monitor a parameter other than those specified in 40 CFR § 63.127(a) - (b).	
			Control Device = Incinerator other than a catalytic incinerator.	
			Halogenated Emissions = There are halogenated emission streams from the transfer rack.	
			Transfer Rack Type = Group 1 transfer rack (as defined in 40 CFR § 63.111).	
			Vapor Balancing System = A vapor balancing system is not being used to reduce emissions of organic hazardous air pollutants.	
			Combustion Device = Halogenated emission streams from the Group 1 transfer rack are combusted.	
			Emissions Routing = Emissions of organic hazardous air pollutants are not routed to a fuel gas system nor to a process where the organic hazardous air pollutants meet one or more of the ends specified in 40 CFR § 63.126(b)(4)(i) - (iv).	
			Bypass Lines = The vent system contains by-pass lines that could divert a vent stream flow away from the control device.	
			Emission Rate = The vent stream halogen atom mass emission rate is not being reduced to less than 0.45 kilograms per hour prior to any combustion control device.	
			Performance Test Exemption = Boiler, process heater, or incinerator does not qualify for exemption and a performance test is required.	
			Title 40 § 63.128(h) Option = The transfer rack is complying with 40 CFR § 63.128(a) or (b).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H.	
			Flow Indicator = A flow indicator is installed at the entrance of the by-pass line.	
			Installation Date = The installation date of the halogen reduction device was	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			prior to December 31, 1992.	
			Shared Control Device = The control device is shared between transfer racks and process vents.	
			Multiple Arms = Control device is not shared between multiple arms loading simultaneously.	
			Scrubber = A scrubber is being used to reduce the halogenated vent stream.	
			Intermittent = The vapor processing system is continuous.	
DPV-008-2	30 TAC Chapter 115, Loading	R5211-DPV-8-2	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	and Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Only loading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading less than 20,000 gallons per day.	
DPV-008-2	40 CFR Part 63, Subpart G	63G-DPV-008-2	Alternate Parameter Monitoring = Approval has not been sought or has not been granted by the EPA Administrator to monitor a parameter other than those specified in 40 CFR § 63.127(a) - (b).	
			Control Device = Incinerator other than a catalytic incinerator.	
			Halogenated Emissions = There are halogenated emission streams from the transfer rack.	
			Transfer Rack Type = Group 1 transfer rack (as defined in 40 CFR § 63.111).	
			Vapor Balancing System = A vapor balancing system is not being used to reduce emissions of organic hazardous air pollutants.	
			Combustion Device = Halogenated emission streams from the Group 1 transfer rack are combusted.	
			Emissions Routing = Emissions of organic hazardous air pollutants are not routed to a fuel gas system nor to a process where the organic hazardous air pollutants meet one or more of the ends specified in 40 CFR § 63.126(b)(4)(i) - (iv).	
			Bypass Lines = The vent system contains by-pass lines that could divert a vent stream flow away from the control device.	
			Emission Rate = The vent stream halogen atom mass emission rate is not being reduced to less than 0.45 kilograms per hour prior to any combustion control device.	
			Performance Test Exemption = Boiler, process heater, or incinerator does not qualify for exemption and a performance test is required.	
			Title 40 \S 63.128(h) Option = The transfer rack is complying with 40 CFR \S 63.128(a) or (b).	
			Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H.	
			Flow Indicator = A flow indicator is installed at the entrance of the by-pass line.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Installation Date = The installation date of the halogen reduction device was prior to December 31, 1992.	
			Shared Control Device = The control device is shared between transfer racks and process vents.	
			Multiple Arms = Control device is not shared between multiple arms loading simultaneously.	
			Scrubber = A scrubber is being used to reduce the halogenated vent stream.	
			Intermittent = The vapor processing system is continuous.	
F-DPV-08A	30 TAC Chapter	R5212-GASOLINE	Chapter 115 Control Device Type = No control device.	
	115, Loading and Unloading of VOC		Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	or voc		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.	
			Product Transferred = Gasoline	
			Transfer Type = Only unloading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.	
F-DPV-08B	30 TAC Chapter	R5212-GASOLINEV	Chapter 115 Control Device Type = No control device.	
	115, Loading and Unloading of VOC		Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	or voc	1 voc	Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.	
			Product Transferred = Gasoline	
			Transfer Type = Only unloading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.	
F-DPV-08C	30 TAC Chapter 115, Loading	R5212-DIESEL	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	and Unloading of VOC	Unloading	Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Only unloading.	
			True Vapor Pressure = True vapor pressure less than 0.5 psia.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
DPV-003	30 TAC Chapter	R7ICI-DPV-003	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	Affected Pollutant – NOx and CO:
	117, Subchapter B		Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	Removed Monitoring/Testing § 117.335(d) since units are so new that early testing is not an option.
			Unit Type = Process heater	Affected Pollutant - CO:
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option	Removed Monitoring/Testing § 117.8120, §
			Maximum Rated Capacity = Maximum rated capacity is at least 40 MMBtu/hr, but less than 100 MMBtu/hr.	117.8120(2), [G]§ 117.8120(2)(A), and § 117.8120(2)(B) since these are only applicable to units listed in § 117.340(c)(1), as explained in
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	§ 117.340(e).
			NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average	
			$NOx Reduction = No NO_x control method$	
			Fuel Type #1 = Natural gas	
			NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	
			Annual Heat Input = Annual heat input is greater than $2.8(10^{11})$ Btu/yr, based on a rolling 12-month average.	
			NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)	
DPV-003	40 CFR Part 63, Subpart DDDDD	63DDDDD-01	CONSTRUCTION/RECONSTRUCTION DATE = Construction or reconstruction began on or before June 4, 2010.	
DPV-004	30 TAC Chapter 117, Subchapter	R7ICI-DPV-004	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	Affected Pollutant - NOx and CO:
	В		Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	Removed Monitoring/Testing § 117.335(d) since units are so new that early testing is not an option.
			Unit Type = Process heater	Affected Pollutant - CO:
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option	Removed Monitoring/Testing § 117.8120, §
			Maximum Rated Capacity = Maximum rated capacity is at least 40 MMBtu/hr, but less than 100 MMBtu/hr.	117.8120(2), [G]§ 117.8120(2)(A), and § 117.8120(2)(B) since these are only applicable to units listed in § 117.340(c)(1), as explained in
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	§ 117.340(e).
			NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average	
			NOx Reduction = No NO_x control method	
			Fuel Type #1 = Natural gas	
			NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	
			Annual Heat Input = Annual heat input is greater than $2.8(10^{11})$ Btu/yr, based on a rolling 12-month average.	
			NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
DPV-004	40 CFR Part 63, Subpart DDDDD	63DDDDD-01	CONSTRUCTION/RECONSTRUCTION DATE = Construction or reconstruction began on or before June 4, 2010.	
DPV-005	30 TAC Chapter 117, Subchapter B	R7ICI-DPV-005	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). Unit Type = Process heater CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option Maximum Rated Capacity = Maximum rated capacity is at least 40 MMBtu/hr, but less than 100 MMBtu/hr. CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS. NOX Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average NOX Reduction = No NO _x control method Fuel Type #1 = Natural gas NOX Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] Annual Heat Input = Annual heat input is greater than 2.8(10 ¹¹) Btu/yr, based on a rolling 12-month average.	Affected Pollutant - NOx and CO: Removed Monitoring/Testing § 117.335(d) since units are so new that early testing is not an option Affected Pollutant - CO: Removed Monitoring/Testing § 117.8120, § 117.8120(2), [G]§ 117.8120(2)(A), and § 117.8120(2)(B) since these are only applicable to units listed in § 117.340(c)(1), as explained in § 117.340(e).
			NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)	
DPV-005	40 CFR Part 63, Subpart DDDDD	63DDDDD-01	CONSTRUCTION/RECONSTRUCTION DATE = Construction or reconstruction began after June 4, 2010.	
DPV-017	30 TAC Chapter 117, Subchapter B	R7ICI-DPV-017	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). Unit Type = Process heater CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option Maximum Rated Capacity = Maximum rated capacity is at least 40 MMBtu/hr, but less than 100 MMBtu/hr. CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS. NOx Emission Limit Basis = Emission limit basis is not a 30 day rolling average or a block one-hour average NOx Reduction = No NO _x control method Fuel Type #1 = Natural gas NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] Annual Heat Input = Annual heat input is greater than 2.8(10 ¹¹) Btu/yr, based on a rolling 12-month average.	Affected Pollutant - CO: Removed Monitoring/Testing § 117.8120, § 117.8120(2), [G]§ 117.8120(2)(A), and § 117.8120(2)(B) since these are only applicable to units listed in § 117.340(c)(1), as explained in § 117.340(e).

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)	
DPV-017	40 CFR Part 63, Subpart DDDDD	63DDDDD-01	CONSTRUCTION/RECONSTRUCTION DATE = Construction or reconstruction began on or before June 4, 2010.	
HCIN-2	40 CFR Part 63,	63EEE	Baghouse = The furnace is not equipped with a baghouse.	
	Subpart EEE		Existing Source = The furnace is an existing source (construction or reconstruction commenced on or before April 20, 2004).	
			Area Source = The furnace is a major source as defined under § 63.2.	
			Dioxin-Listed = The furnace does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.	
			Dioxin/Furan Standard = Complying with the CO standard in § $63.1218(a)(1)$ or $(b)(1)$.	
			DRE Previous Test = DRE testing during the comprehensive intial performance testing is used to document conformance with the DRE standard.	
			CO/THC Standard = Complying with the CO standard in § 63.1218(a)(5)(i) or (b)(5)(i).	
			TOT-Cl Standard = Complying with the 25 ppmv standard in \S 63.1218(a)(6)(i) or (b)(6)(i).	
HCIN-3	40 CFR Part 63,		Baghouse = The furnace is not equipped with a baghouse.	
	Subpart EEE		Existing Source = The furnace is an existing source (construction or reconstruction commenced on or before April 20, 2004).	
			Area Source = The furnace is a major source as defined under § 63.2.	
			Dioxin-Listed = The furnace does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.	
		(b)(1). DRE Previous Test = testing is used to do	Dioxin/Furan Standard = Complying with the CO standard in § $63.1218(a)(1)$ or $(b)(1)$.	
			DRE Previous Test = DRE testing during the comprehensive intial performance testing is used to document conformance with the DRE standard.	
			CO/THC Standard = Complying with the CO standard in \S 63.1218(a)(5)(i) or (b)(5)(i).	
			TOT-Cl Standard = Complying with the 25 ppmv standard in \S 63.1218(a)(6)(i) or (b)(6)(i).	
F-DPV-01	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.	
			ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT	
			ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT	
			BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE	
			EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT PRESENT	
			LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT	
			NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES	
			RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT	
			UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED- VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT	
			ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT	
			DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT	
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS	
			VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE	
			ANY (COMPRESSORS) = COMPONENT PRESENT	
			EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS	
			ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT	
			LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR	
			ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT	
			GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT	
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES	
			AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)	
			FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) =	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			COMPONENT NOT PRESENT	
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT	
			ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT	
F-DPV-02	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.	
			ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT	
			ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT	
			BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE	
			EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT	
			LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT	
			NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES	
			RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT	
			UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED- VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT	
			ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT	
			DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT	
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS	
			VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE	
			ANY (COMPRESSORS) = COMPONENT PRESENT	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS	
			ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT	
			LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR	
			ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT	
			GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT	
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES	
			AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)	
			FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT	
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT	
			ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT	
F-DPV-03	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.	
			ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT	
			ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT	
			BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE	
			EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT	
			LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT	
			NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES	
			RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT	
			UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED- VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT	
			ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT	
			DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT	
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS	
			VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE	
			ANY (COMPRESSORS) = COMPONENT PRESENT	
			EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS	
			ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT	
			LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR	
			ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT	
			GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT	
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES	
			AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)	
			FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT	
			GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT	
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT	
			HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT	
			ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT	
			HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT	
F-DPV-HRV	30 TAC Chapter	R5780-1	Agitators = The fugitive unit does not contain agitators.	
	115, HRVOC Fugitive Emissions		Alternative Work Practice in § 115.358 = No components are complying with the alternative work practice requirements in 30 TAC § 115.358.	
	Limissions		Compressor Seals = The fugitive unit contains compressor seals.	
			Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.	
			Process Drains = The fugitive unit does not contain process drains.	
			Title 30 TAC §115.780 Applicable = The fugitive unit contains a defined process and Highly Reactive VOC.	
			Valves (not pressure relief, open-ended or bypass line valves) = The fugitive unit contains valves other than pressure relief, open-ended or bypass line valves.	
			ACR = No open-ended valves or lines are complying with an altenate control requirement.	
			Less Than 250 Components at Site = The fugitive unit is located at a site with at least 250 fugitive components in VOC service.	
			Weight Percent HRVOC = All components contact only a process fluid that contains at least 5.0% HRVOC by weight on an annual average basis.	
			Complying with § $115.781(b)(9)$ = Open-ended valves or lines are complying with the requirements of § $115.781(b)(9)$.	
			Pumps with Shaft Seal System = No pumps are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.	
			Bypass Line Valves = The fugitive unit contains bypass line valves.	
			Compressors with Shaft Seal System = Compressors are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.	
			Flanges or Other Connectors = The fugitive unit contains flanges or other connectors.	
			Heat Exchanger Heads, etc. = The fugitive unit contains heat exchanger heads, sight glasses, meters, gauges, sampling connections, bolter manways, hatches, sump covers, junction vent boxes or covers and seals on VOC water separators.	
			Pressure Relief Valves = The fugitive unit contains pressure relief valves.	
			Pump Seals = The fugitive unit does not contain pump seals.	
			ACR = No bypass line valves are complying with an alternate control requirement.	
			Agitators with Shaft Seal System = No agitators are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.	
			Complying with § 115.781(b)(9) = Pressure relief valves are complying with the	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**			
			requirements of § 115.781(b)(9).				
NHRV 115, HF Fugitive	30 TAC Chapter 115, HRVOC	R5780-1	Title 30 TAC §115.780 Applicable = The fugitive unit contains a defined process and Highly Reactive VOC.				
	Fugitive Emissions		Less Than 250 Components at Site = The fugitive unit is located at a site with at least 250 fugitive components in VOC service.				
			Weight Percent HRVOC = All components contact only a process fluid that contains less than 5.0% HRVOC by weight on an annual average basis.				
DPV-025	30 TAC Chapter 115, HRVOC	R5760-DPV-25	Cooling Tower Heat Exchange System Exemptions = The cooling tower heat exchange system does not qualify for an exemption.				
	Cooling Towers		Jacketed Reactor = The cooling tower heat exchange system is not in dedicated service to a jacketed reactor.				
			Alternative Monitoring = Complying with the specified monitoring in 30 TAC § 115.764.				
			Design Capacity = Design capacity to circulate 8000 gpm or greater.				
			Finite Volume System = The cooling tower heat exchange system is complying with the requirements in § 115.764(a).				
			Modified Monitoring = Not using minor modifications to the monitoring and testing methods in 30 TAC § 115.764.				
			Flow Monitoring/Testing Method = Choosing to use the maximum potential flow rate based on the manufacturer's pump performance data in accordance with §115.764(e)(1).				
			Total Strippalbe VOC = The cooling tower heat exchange system is complying with the requirements of § 115.764(a).				
						On-Line Monitor = Speciated strippable HRVOC concentration is being determined by sampling.	
DPV-006	30 TAC Chapter 111, Visible	R1111-DC1	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.				
	Emissions		Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.				
			Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of $\S 111.111(a)(1)(D)$, or the vent stream does not qualify for the exemption in $\S 111.111(a)(3)$.				
			Construction Date = On or before January 31, 1972				
			Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.				
DPV-007	30 TAC Chapter 111, Visible	R1111-DC2	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.				
	Emissions		Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.				
			Opacity Monitoring System = Optical instrument capable of measuring the				

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of $\S 111.111(a)(1)(D)$, or the vent stream does not qualify for the exemption in $\S 111.111(a)(3)$.	
			Construction Date = On or before January 31, 1972	
			Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.	
VH-A-1	30 TAC Chapter	R5720-EDC2	Alternative Monitoring = Not using alternative monitoring and testing methods.	
	115, HRVOC Vent Gas		HRVOC Concentration = The vent gas stream has a HRVOC concentration of at least 100 ppmv at some times.	
			Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft3/hr).	
			Minor Modification = Not using any minor modification to the monitoring and testing methods of the rule.	
			Vent Gas Stream Control = Vent gas stream is controlled by a control device other than a flare.	
			Process Knowledge = Process knowledge and engineering calculations are used to determine HRVOC emissions during emission events and scheduled startup, shutdown, and maintenance activities.	
			Waived Testing = The executive director waived testing for identical vents.	
			Testing Requirements = Testing procedures specified in § 115.125 were conducted prior to December 31, 2004, and they are being used in lieu of conducting new tests.	
VH-A-1	30 TAC Chapter	R5121-EDC-HCIN2	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
			VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.	
VH-A-1	40 CFR Part 63, Subpart G	63G-VH-A-1	Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not	Affected Pollutant - 112(B) HAPS: Added Monitoring/Testing § 63.114(a) and §
			used. Control Device = Thermal hazardous waste incinerator meeting the requirement	63.114(a)(1)(i) for incinerator monitoring. Added Recordkeeping § 63.114(a)(1) for

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			of 40 CFR § 63.116(b)(5).	recording incinerator monitoring data.
			Overlap = Title 40 CFR Part 61, Subpart F	
			Group $1 = $ The process vent meets the definition of a Group 1 process vent.	
			Halogenated = Vent stream is halogenated.	
			By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.	
			Halogen Reduction Device = The vent stream exiting the combustion device is ducted to a scrubber before it is discharged to the atmosphere.	
			Installation Date = Prior to 12/31/92	
			Performance Test = No previous performance test was conducted.	
VH-A-2	30 TAC Chapter	R5720-EDC3	Alternative Monitoring = Not using alternative monitoring and testing methods.	
	115, HRVOC Vent Gas	HRVOC	HRVOC Concentration = The vent gas stream has a HRVOC concentration of at least 100 ppmv at some times.	
			Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft3/hr).	
			Minor Modification = Not using any minor modification to the monitoring and testing methods of the rule.	
			Vent Gas Stream Control = Vent gas stream is controlled by a control device other than a flare.	
			Process Knowledge = Process knowledge and engineering calculations are used to determine HRVOC emissions during emission events and scheduled startup, shutdown, and maintenance activities.	
			Waived Testing = The executive director waived testing for identical vents.	
			Testing Requirements = Testing procedures specified in § 115.125 were conducted prior to December 31, 2004, and they are being used in lieu of conducting new tests.	
VH-A-2	30 TAC Chapter	Vent Gas	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
			VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			requirements of 30 TAC § 115.126(4) are not being selected.	
VH-A-2	40 CFR Part 63, Subpart G	63G-VH-A-2	Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	Affected Pollutant - 112(B) HAPS: Added Monitoring/Testing § 63.114(a) and § 63.114(a)(1)(i) for incinerator monitoring. Added Recordkeeping § 63.114(a)(1) for recording incinerator monitoring data.
			Control Device = Thermal hazardous waste incinerator meeting the requirement of 40 CFR § 63.116(b)(5).	
			Overlap = Title 40 CFR Part 61, Subpart F	recording memerator monitoring data.
			Group $1 = $ The process vent meets the definition of a Group 1 process vent.	
			Halogenated = Vent stream is halogenated.	
			By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.	
			Halogen Reduction Device = The vent stream exiting the combustion device is ducted to a scrubber before it is discharged to the atmosphere.	
			Installation Date = Prior to 12/31/92	
			Performance Test = No previous performance test was conducted.	
VH-A-3	30 TAC Chapter 115, HRVOC Vent Gas	5, HRVOC	HRVOC Concentration = The vent gas stream has a HRVOC concentration less than 100 ppmv at all times.	
			Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft3/hr).	
			Exempt Date = The vent gas stream is not exempt.	
VH-A-3	30 TAC Chapter 115, Vent Gas Controls	5, Vent Gas	Alternate Control Requirement = Alternate control is not used.	
			Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
			VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.	
VH-A-3	40 CFR Part 63, Subpart G		Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	Affected Pollutant - 112(B) HAPS: Added Monitoring/Testing § 63.114(a) and §
			Control Device = Thermal hazardous waste incinerator meeting the requirement of 40 CFR \S 63.116(b)(5).	63.114(a)(1)(i) for incinerator monitoring. Added Recordkeeping § 63.114(a)(1) for

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Overlap = Title 40 CFR Part 61, Subpart F	recording incinerator monitoring data.
			Group $1 =$ The process vent meets the definition of a Group 1 process vent.	
			Halogenated = Vent stream is halogenated.	
			By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.	
			Halogen Reduction Device = The vent stream exiting the combustion device is ducted to a scrubber before it is discharged to the atmosphere.	
			Installation Date = Prior to 12/31/92	
			Performance Test = No previous performance test was conducted.	
VH-A-4	30 TAC Chapter 115, HRVOC	R5720-VCM3	HRVOC Concentration = The vent gas stream has a HRVOC concentration less than 100 ppmv at all times.	
	Vent Gas		Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft3/hr).	
			Exempt Date = The vent gas stream is not exempt.	
VH-A-4	30 TAC Chapter	R5121-VCM-HCIN3	Alternate Control Requirement = Alternate control is not used.	
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).	
			Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
			VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
			VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.	
VH-A-4	40 CFR Part 63, Subpart G	63G-VH-A-4	Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	Affected Pollutant - 112(B) HAPS: Added Monitoring/Testing § 63.114(a) and § 63.114(a)(1)(i) for incinerator monitoring
			Control Device = Thermal hazardous waste incinerator meeting the requirement of 40 CFR § 63.116(b)(5).	Added Recordkeeping § 63.114(a)(1) for recording incinerator monitoring data.
			Overlap = Title 40 CFR Part 61, Subpart F	Teestang memerator monitoring autu-
			Group $1 = $ The process vent meets the definition of a Group 1 process vent.	
			Halogenated = Vent stream is halogenated.	
			By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Halogen Reduction Device = The vent stream exiting the combustion device is ducted to a scrubber before it is discharged to the atmosphere.	
			Installation Date = Prior to 12/31/92	
			Performance Test = No previous performance test was conducted.	
DG-1	30 TAC Chapter	R5412-DG-1	Solvent Degreasing Machine Type = Cold solvent cleaning machine.	
	115, Degreasing Processes		Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested.	
			Solvent Sprayed = No solvent is sprayed.	
			Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit.	
			Solvent Heated = The solvent is not heated to a temperature greater than 120° F.	
			Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine.	
			Drainage Area = Area is greater than or equal to 16 square inches.	
			Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.	
E-6101	40 CFR Part 60, Subpart RRR	60RRR-E-6101	Chemicals Listed in 40 CFR \S 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR \S 60.707 as a product, co-product, by product, or intermediate.	
			Construction/Modification Date = On or before June 29, 1990.	
E-6118	40 CFR Part 60, Subpart RRR	60RRR-E-6118	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.	
			Construction/Modification Date = On or before June 29, 1990.	
E-6151	40 CFR Part 60, Subpart RRR	60RRR-E-6151	Chemicals Listed in 40 CFR \S 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR \S 60.707 as a product, co-product, by product, or intermediate.	
			Construction/Modification Date = On or before June 29, 1990.	
E-6152	40 CFR Part 60, Subpart RRR	60RRR-E-6152	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.	
			Construction/Modification Date = On or before June 29, 1990.	
E-6153	40 CFR Part 60, Subpart RRR	60RRR-E-6153	Chemicals Listed in 40 CFR \S 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR \S 60.707 as a product, co-product, by product, or intermediate.	
			Construction/Modification Date = On or before June 29, 1990.	
PROC1	40 CFR Part 61, Subpart F	61F-PROC1	Bulk Resin Reactor = The process does not include a bulk resin reactor or a nonbulk resin reactor not used as a stripper.	
			Existing Source = The source is an existing source.	
			Product Produced = Ethylene dichloride by reaction of oxygen and hydrogen	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			chloride with ehtylene.	
			EEP = The EPA Administrator has not approved equivalent equipment or procedures.	
			Nonbulk Resin Reactor = The process does not include a nonbulk resin reactor used as a stripper.	
			Reactor = The process includes a reactor.	
			Oxychlorination Reactor = The process contains an oxychlorination reactor.	
			Stripper = The process includes a stripper.	
			Stripping Operation to Attain § 61.64(e) = A stripping operation is used to attain the emission	
			level prescribed in 40 CFR § 61.64(e).	
			Batch Stripping = Batch stripping is used.	
			Ethylene Dichloride Purification = The process does not contain equipment used in ethylene dichloride purification.	
			Monomer Recovery System = The process includes a monomer recovery system.	
			Preceding Stripper = Mixing, weighing, or holding containers precede a stripper (or reactor if the process has no stripper).	
			Technology = Technology other than, or in addition to, a stripping operation is used to control vinyl chloride emissions.	
PROC2	40 CFR Part 61, Subpart F	61F-PROC2	Bulk Resin Reactor = The process does not include a bulk resin reactor or a nonbulk resin reactor not used as a stripper.	Affected Pollutant - VINYL CHLORIDE: Added Related Standard § 61.60(a)(2) to clarify that this is a vinly chloride production process
			Existing Source = The source is an existing source.	
			Product Produced = Vinyl chloride by any process.	
			EEP = The EPA Administrator has not approved equivalent equipment or procedures.	
			Nonbulk Resin Reactor = The process does not include a nonbulk resin reactor used as a stripper.	
			Reactor = The process includes a reactor.	
			Stripper = The process includes a stripper.	
			Stripping Operation to Attain § 61.64(e) = A stripping operation is used to attain the emission	
			level prescribed in 40 CFR § 61.64(e).	
			Batch Stripping = Batch stripping is used.	
			Monomer Recovery System = The process includes a monomer recovery system.	
			Preceding Stripper = Mixing, weighing, or holding containers precede a stripper (or reactor if the process has no stripper).	
			Technology = Technology other than, or in addition to, a stripping operation is used to control vinyl chloride emissions.	
PROCMP1	40 CFR Part 63, Subpart F	63F-PROCMP1	Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.	
			Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.	
			Table 4 HAP Content = The recirculating heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.	
			Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.	
			NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.	
			Meets 40 CFR $63.104(a)(4)(i)$ -(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § $63.104(a)(4)(i)$ - (iv).	
			Heat Exchange System = A heat exchange system is utilized.	
			Table 9 HAP Content = The once-through heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.	
			Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.	
			Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.	

^{* -} The "unit attributes" or operating conditions that determine what requirements apply
** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification	For initial permit with application shield, can be issued
of an existing facility	after operation commences; significant revisions require
	approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not
	authorize new emissions
Ensures issued permits are protective of the	Applicable requirements listed in permit are used by
environment and human health by conducting a	the inspectors to ensure proper operation of the site as
health effects review and that requirement for	authorized. Ensures that adequate monitoring is in
best available control technology (BACT) is	place to allow compliance determination with the FOP.
implemented.	
Up to two Public notices may be required.	One public notice required. Opportunity for public
Opportunity for public comment and contested	comments. No contested case hearings.
case hearings for some authorizations.	
Applies to all point source emissions in the state.	Applies to all major sources and some non-major
	sources identified by the EPA.
Applies to facilities: a portion of site or	One or multiple FOPs cover the entire site (consists of
individual emission sources	multiple facilities)
Permits include terms and conditions under	Permits include terms and conditions that specify the
which the applicant must construct and operate	general operational requirements of the site; and also
its various equipment and processes on a facility	include codification of all applicable requirements for
basis.	emission units at the site.
Opportunity for EPA review for Federal	Opportunity for EPA review, Affected states review, and
Prevention of Significant Deterioration (PSD) and	a Public petition period for every FOP.
Nonattainment (NA) permits for major sources.	
Permits have a table listing maximum emission	Permit has an applicable requirements table and
limits for pollutants	Periodic Monitoring (PM) / Compliance Assurance
	Monitoring (CAM) tables which document applicable
	monitoring requirements.
Permits can be altered or amended upon	Permits can be revised through several revision
application by company. Permits must be issued	processes, which provide for different levels of public
before construction or modification of facilities	notice and opportunity to comment. Changes that
can begin.	would be significant revisions require that a revised
100	permit be issued before those changes can be operated.
NSR permits are issued independent of FOP	FOP are independent of NSR permits, but contain a list
requirements.	of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

 $www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106 list/index106.html$

Outdated Standard Exemption lists may be viewed at the following Web site: www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 4943B	Issuance Date: 07/09/2014	
Permits By Rule (30 TAC Chapter 106) for the Application Area		
Number: 106.227	Version No./Date: 09/04/2000	
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.262	Version No./Date: 11/01/2003	
Number: 106.263	Version No./Date: 11/01/2001	
Number: 106.264	Version No./Date: 09/04/2000	
Number: 106.265	Version No./Date: 09/04/2000	
Number: 106.412	Version No./Date: 09/04/2000	
Number: 106.454	Version No./Date: 11/01/2001	
Number: 106.472	Version No./Date: 09/04/2000	
Number: 106.473	Version No./Date: 09/04/2000	
Number: 106.511	Version No./Date: 09/04/2000	
Number: 106.532	Version No./Date: 09/04/2000	

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the

Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information		
ID No.: VH-A-1		
Control Device ID No.: HCIN-2 Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)		
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-EDC-HCIN2	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		

Minimum Frequency: Four times per hour

Averaging Period: Hourly

Deviation Limit: Incinerator firebox temperature must be maintained at not less than 1,300°F.

Unit/Group/Process Information	
ID No.: VH-A-1	
Control Device ID No.: HCIN-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, HRVOC Vent Gas	SOP Index No.: R5720-EDC2
Pollutant: HIGHLY REACTIVE VOC	Main Standard: § 115.722(c)(1)
Monitoring Information	
Indicator: Firebox temperature	
Minimum Frequency: Four times per hour	

Averaging Period: Hourly

Deviation Limit: Incinerator firebox temperature must be maintained at not less than 1,300°F.

Unit/Group/Process Information		
ID No.: VH-A-2		
Control Device ID No.: HCIN-3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-EDC-HCIN3	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator: Firehoy temperature		

Minimum Frequency: Four times per hour

Averaging Period: Hourly

Deviation Limit: Incinerator firebox temperature must be maintained at not less than 1,300°F.

Unit/Group/Process Information	
ID No.: VH-A-2	
Control Device ID No.: HCIN-3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, HRVOC Vent Gas	SOP Index No.: R5720-EDC3
Pollutant: HIGHLY REACTIVE VOC	Main Standard: § 115.722(c)(1)
Monitoring Information	
Indicator: Firebox temperature	
Minimum Frequency: Four times per hour	

Averaging Period: Hourly

Deviation Limit: Incinerator firebox temperature must be maintained at not less than 1,300°F.

Unit/Group/Process Information		
ID No.: VH-A-3		
Control Device ID No.: HCIN-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-VCM-HCIN2	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator, Einshow tamparatura		

Minimum Frequency: Four times per hour

Averaging Period: Hourly

Deviation Limit: Incinerator firebox temperature must be maintained at not less than 1,300°F.

Unit/Group/Process Information		
ID No.: VH-A-4		
Control Device ID No.: HCIN-3	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-VCM-HCIN3	
Pollutant: VOC	Main Standard: § 115.122(a)(2)	
Monitoring Information		
Indicator: Fireboy temperature		

Minimum Frequency: Four times per hour

Averaging Period: Hourly

Deviation Limit: Incinerator firebox temperature must be maintained at not less than 1,300°F.

Periodic Monitoring:

operating in accordance with its design.

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information		
ID No.: DG-1		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412-DG-1	
Pollutant: VOC	Main Standard: § 115.412(1)	
Monitoring Information		
Indicator: Visual Inspection		
Minimum Frequency: Monthly		
Averaging Period: N/A		
Deviation Limit: Non-compliance with 30 TAC 115.412(1)(A), (C), or (F).		
Basis of monitoring:		

The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the

cleaner records of monthly inspections of equipment is an effective way to ensure that the system is

Page 45 of 51

Unit/Group/Process Information		
ID No.: DPV-006		
Control Device ID No.: DPV-006	Control Device Type: Cyclone	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-DC1	
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(A)	
Monitoring Information		
Indicator: Visible Emissions		
Minimum Frequency: once per calendar quarter		
Averaging Period: n/a		

Basis of monitoring:

Deviation Limit: Opacity limit of 30%

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: DPV-007		
Control Device ID No.: DPV-007	Control Device Type: Cyclone	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-DC2	
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(A)	
Monitoring Information		
Indicator: Visible Emissions		
Minimum Frequency: once per calendar quarter		

Averaging Period: n/a

Deviation Limit: Opacity limit of 30%

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: F-DPV-05		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-SW-BLAST	
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(8)(A)	
Monitoring Information		
Indicator: Visible emissions		
Minimum Frequency: Quarterly		

Averaging Period: n/a

Deviation Limit: Opacity limit of 30% for abrasive blast operations.

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: F-DPV-06		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-SW-PAINT	
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(8)(A)	
Monitoring Information		
Indicator: Visible emissions		

Averaging Period: n/a

Minimum Frequency: Quarterly

Deviation Limit: Opacity limit of 30% for spray paint operations.

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Compliance Review	
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>December 11, 2015.</u>	
Site rating: <u>3.00 / Satisfactory</u> Company rating: <u>2.10 / Satisfactory</u>	
(High < 0.10 ; Satisfactory ≥ 0.10 and ≤ 55 ; Unsatisfactory > 55)	
2. Has the permit changed on the basis of the compliance history or site/company rating?	No
Site/Permit Area Compliance Status Review	
1. Were there any out-of-compliance units listed on Form OP-ACPS?	No
2. Is a compliance plan and schedule included in the permit?	No
Available Unit Attribute Forms	
OP-UA1 - Miscellaneous and Generic Unit Attributes	
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes	
OP-UA3 - Storage Tank/Vessel Attributes	
OP-UA4 - Loading/Unloading Operations Attributes	
OP-UA5 - Process Heater/Furnace Attributes	
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes	
OP-UA7 - Flare Attributes	
OP-UA8 - Coal Preparation Plant Attributes OP-UA9 - Nonmetallic Mineral Process Plant Attributes	
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes OP-UA11 - Stationary Turbine Attributes	
OP-UA12 - Fugitive Emission Unit Attributes	
OP-UA13 - Industrial Process Cooling Tower Attributes	
OP-UA14 - Water Separator Attributes	
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes	
OP-UA16 - Solvent Degreasing Machine Attributes	
OP-UA17 - Distillation Unit Attributes	
OP-UA18 - Surface Coating Operations Attributes	
OP-UA19 - Wastewater Unit Attributes	
OP-UA20 - Asphalt Operations Attributes	
OP-UA21 - Grain Elevator Attributes	
OP-UA22 - Printing Attributes	
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes	
OP-UA25 - Synthetic Fiber Production Attributes	
OP-UA26 - Electroplating and Anodizing Unit Attributes	
OP-UA27 - Nitric Acid Manufacturing Attributes	
OP-UA28 - Polymer Manufacturing Attributes OP-UA29 - Glass Manufacturing Unit Attributes	
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes	
OP-UA31 - Lead Smelting Attributes	
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes	
OP-UA33 - Metallic Mineral Processing Plant Attributes	
OP-UA34 - Pharmaceutical Manufacturing	
OP-UA35 - Incinerator Attributes	
OP-UA36 - Steel Plant Unit Attributes	
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes	
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes	
OP-UA39 - Sterilization Source Attributes	
OP-UA40 - Ferroalloy Production Facility Attributes	
OP-UA41 - Dry Cleaning Facility Attributes	
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes	
OP-UA43 - Sulfuric Acid Production Attributes	
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes	

- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur
- **Recovery Plant Attributes**
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- OP-UA58 Treatment Process Attributes
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes